Statement of Captain Charles R. Corbett
U. S. Coast Guard
before the
Subcommittee on Oceanography
Committee on Merchant Marine and Fisheries
U. S. House of Representatives
August 26, 1980

Good morning, Mr. Chairman and members of the Committee. I am Captain Charles Corbett, Chief, Environmental Response Division of the Coast Guard's Office of Marine Environment and Systems. Thank you for this opportunity to present the Coast Guard's views concerning the state of technological development and availability of containment and clean-up equipment for drilling activities on the outer continental shelf.

Technological development of containment and recovery equipment has proceeded to the point where it is realistic to expect successful operation of open ocean recovery equipment in eight to ten foot seas and in winds of at least 20 knots. This is considered the current "state of the art" and is based on observations made of the Coast Guard's open water oil containment and recovery system used on the IXTOC I oil spill at the Bay of Campeche well site. We do not expect significant technological advances in this area since our experience indicates that this may be the outer limit at which mechanical recovery of oil is possible. This rationale is based on the premise that break up of oil and dispersion takes place in about an 8-10 foot sea. We have an R&D effort underway to develop a computer model that will predict the break-up and dispersion of floating oil slicks in rough seas.

As a result of the Presidential Initiatives of 1977, the Secretary of Transportation has approved for planning purposes a three year project to locate open water containment and recovery systems at eleven high risk areas around the country. Equipment would be stockpiled and maintained at facilities with the objective of attaining a nationwide, aggregate oil recovery capacity of 200 tons of oil per hour, that is, approximately 1400 gallons per hour, conditions permitting. We now have some of the equipment at each of our strike teams which, as you know, are located at Elizabeth City, N.C., Hamilton AFB, CA, and Bay St. Louis, MS. Siting of equipment at the eight other locations is, of course, dependent on the budgetary process, to begin FY 1982.

As you are aware, it is the spiller's responsibility to control, clean up and mitigate damages if a spill should occur. A Memorandum of Understanding between U.S. Coast Guard and U.S. Geological Survey presently under development will task the Coast Guard with review of those portions of exploration or development and production plans which address the adequacy of the required oil spill contingency plan, including the adequacy of response, cleanup equipment and procedures. It should be noted that pending finalization of the MOU the Coast Guard & U.S. Geological Survey have an informal agreement implementing this mechanism for lease sale 42 on Georges Bank. The Coast Guard review will occur prior to approval for actual drilling. The guidelines under which we intend to conduct the review will call for oil containment and recovery equipment to be "state of the art" that is, capable of effective operation in eight to ten foot seas and in winds of at least 20 knots.

Since the quantity of equipment that we would require of the OCS . lease

operators should be related to the spill threat, a recovery capacity of at least 1000 barrels per day should be the minimum recovery rate acceptable.

A time of six hours for initiating recovery operations with pre-staged equipment is the target we have set. That is, whatever amounts of equipment that we require OCS lease operators have available for responding to spills, should be fully deployed and in operation within six hours from the time the spill occurs, weather permitting. Where equipment is to be staged will be left to the operator, but he must demonstrate that the response target criteria can be met under all conditions under which the equipment is expected to be effectively operated. Within 48 hours after a spill, an operator would be expected to have any additional equipment on scene and in position to address a spill of extraordinary dimensions.

We also believe that response exercises must take place at least semiannually. At least one of these semi-annual exercises must be structured to
test the response mechanism under the most demanding environmental conditions
in which it is expected to be effective, that is eight to ten foot seas.

Vessels capable of deploying and operating the "state of the art" response equipment, in its maximum effective sea state must also be available within the same response time parameters as used for response equipment. The crews of all candidate support vessels must be familiar with equipment deployment and operating techniques, or a system developed for supplying trained crews/supervisors to the involved vessels within the specified response time. In addition to oil recovery equipment, offshore operators must be required to maintain equipment for applying dispersants and adequate stockpiles of dispersants, if these are not readily available from distributers. This requirement should not be interpreted as a preference on the part of

government for the use of dispersants. Instead, it recognizes that spills may well occur in which the mechanical removal of oil is not possible due to environmental conditions. Under circumstances such as these, it is desirable that all options be available. The decisions to use dispersants would of course be made using the criteria and procedures set forth in Annex X of the National Contingency Plan.

there now exists an in place capability to reliably respond to a major oil spill in the OCS. However, the Coast Guard will continue to work closely with other Federal and state agencies as well as industry to pursue development of adequate contingency planning for the OCS. I thank you and the Committee members for inviting the Coast Guard to participate in these proceedings. I will be happy to address any questions you, or the other members may have.